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October 10, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
Portals II - 12th Street Lobby
Filing Counter - TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: Petition for Rule Making
Amendment of Section 73.202(b)
FM Table of Allotments
Station KSWG(FM)
Wickenburg, Arizona

Dear Ms. Salas:

Transmitted herewith, on behalf of Circle S Broadcasting Co., Inc., licensee of Station KSWG(FM), Wickenburg, Arizona, are an original and four copies of its Petition for Rule Making, which seeks the amendment of Section 73.202(b) of the Commission's rules to substitute 242C for Channel 242C3 at Wickenburg, Arizona. Please contact the undersigned in the event the Commission has any questions with respect to this proposal.

Sincerely,



Lee J. Peltzman
Counsel for

CIRCLE S BROADCASTING CO., INC.

Enclosure

ORIGINAL

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Wickenburg, Arizona)

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)
)
)

MM Docket No. _____
RM- _____

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Circle S Broadcasting Co., Inc. ("Circle S"), licensee of Station KSWG(FM), Wickenburg, Arizona ("Petitioner"), by its counsel, hereby requests that the Commission amend its FM Table of Allotments to substitute Channel 242C for Channel 242C3 at Wickenburg. If this Petition is granted, Circle S will file an application to modify the license of Station KSWG(FM) to specify operation on Channel 242C at Wickenburg, and will so modify its station upon grant of its application. In support of its proposal, Circle S submits the following:

Channel 242C3 has been allotted to Wickenburg and the license for Station KSWG(FM) has been modified accordingly, as a result of *Memorandum Opinion and Order*, DA 01-2000, released August 24, 2001. That *Memorandum Opinion and Order* became effective on October 9, 2001. As demonstrated in the attached Engineering Exhibit, Channel 242C can be allotted to Wickenburg as a substitute for Channel 242C3 as long as the vacant channel allocation at Salome, Arizona is modified from Channel 241A to specify operation on Channel 270A. With the substitution of Channel 270A at Salome, the allotment of Channel 242C at Wickenburg will

meet all minimum distance spacing requirements pursuant to Section 73.207 of the Commission's rules using the reference coordinates of 33-54-15N, 112-59-02W. Moreover, the required 70 dBu signal can be provided to Wickenburg from the proposed reference point, thereby satisfying the principal community contour coverage requirements contained in Section 73.315 of the rules.

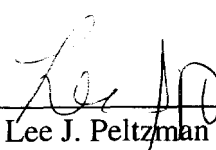
The substitution of Channel 242C for Channel 242C3 at Wickenburg, Arizona, will serve the public interest because it will result in an expanded service. Accordingly, the Commission should promptly issue a Notice of Proposed Rule Making as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Wickenburg, Arizona	242C3, 287C2	242C, 287C2
Salome, Arizona	241A	270A

Respectfully submitted,

CIRCLE S BROADCASTING CO., INC.

By: _____


Lee J. Peltzman
Its Attorney

Shainis & Peltzman, Chartered
1850 M Street, N.W., Suite 240
Washington, D.C. 20036
202-293-0011

Date: October 10, 2001

Petition for Rulemaking

The following engineering statement and attached exhibits have been prepared for Circle S Broadcasting Co., Inc., licensee of FM broadcast station KSWG(FM) at Wickenburg, Arizona, and are in support of their petition for rulemaking to modify the Table of Allotments contained in Section 73.202(b) of the Commission's Rules.

The proponent seeks to have the FM Table of Allotments modified as follows:

<u>City</u>	<u>Existing</u>	<u>Proposed</u>
Wickenburg, AZ	242C3, 287C2	242C, 287C2
Salome, AZ	241A	270A

The attached single channel spacing study, as explained, demonstrates that channel 242C could be utilized as a class C facility at the coordinates of 33° 54' 15" North Latitude, 112° 59' 02" West Longitude. In order to accommodate this spacing at this location, it is necessary to change the channel of operation for the vacant allocation at Salome, Arizona.

As the second single channel spacing study demonstrates, the vacant allocation at Salome, Arizona could be modified to specify operation on channel 270A in compliance with all Commission spacing criteria. The reference coordinates for this modified allocation do not need to be changed from those specified in the original rulemaking for Salome, AZ. The reference coordinates

for channel 270A at Salome, AZ would be 33° 46' 54" North Latitude, 113° 36' 42" West Longitude.

With regard to the first single channel spacing study, which illustrates the allocation situation for channel 242C at Wickenburg, the "Wickenburg" short spacings all pertain to previous rulemakings, or the recently granted allocation to that community. As a result, these indicated short spacings are moot. In the case of the short spacings listed for Bagdad, Congress, and Winona, these are all previous rulemakings, which were ultimately not implemented by the Commission. As a result, the only pertinent short spacing indicated is the one to the present allocation at Salome, AZ on channel 241A, which as demonstrated above, may be accommodated on channel 270A.

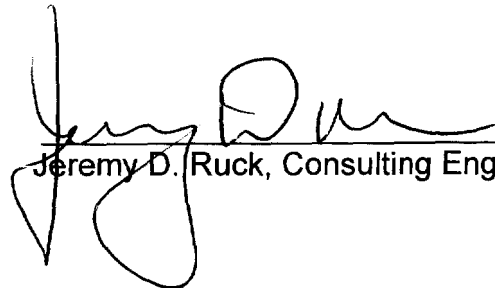
The map attached to this petition depicts the predicted 70 dBu service contour from the reference site for the channel 242C allocation at Wickenburg, Arizona. In creating this map, it was assumed that the facility would operate with a center of radiation of 600 meters above average terrain. This map was computer generated using a commercially available software package. As a result of the computer generation, it was possible to sample terrain elevations at one-degree increments of azimuth. It is therefore believed that this map is considerably more accurate than a similar map generated by hand.

A coverage map for the Salome allocation has not been included with this petition. In the original petition for rulemaking for that allocation it was demonstrated that the allocated channel would serve the community of license in accordance with Commission's Rules. That allocation would remain at the same reference coordinates, therefore, it is respectfully submitted that the Salome allocation would provide city grade signal over that community as determined by the Commission's standard propagation model.

The proponent agrees to file an application should the Petition for Rulemaking be granted. The application will be filed in accordance with the Commission's standard procedures.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

10/09/2001
Date



Jeremy D. Ruck, Consulting Engineer

KSWG Proposed Allocation Channel 242C
D.L. Markley & Associates Inc.

REFERENCE
33 54 15 N
112 59 02 W

CLASS = C
Current Spacings

DISPLAY DATES
DATA 10-05-01
SEARCH 10-09-01

----- Channel 242 - 96.3 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
RADD	ADD 242C3	Wickenburg	AZ	24.88	67.3	237.0 -212.12
RDEL	DEL 242C3	Wickenburg	AZ	29.39	64.6	237.0 -207.61
ALLO	VAC 242C3	Wickenburg	AZ	29.39	64.6	237.0 -207.61
RADD	ADD 242C3	Wickenburg	AZ	29.39	64.6	237.0 -207.61
RADD	ADD 242A	Congress	AZ	30.93	25.0	226.0 -195.07
RADD	ADD 242C3	Bagdad	AZ	66.18	347.1	237.0 -170.82
ALLO	VAC 241A	Salome	AZ	59.67	257.0	165.0 -105.33
RADD	ADD 242C3	Winona	AZ	204.27	44.6	237.0 -32.73
KMXP	LIC 245C	Phoenix	AZ	106.52	126.3	105.0 1.52
KKLZ	LIC 242C	Las Vegas	NV	297.61	322.4	290.0 7.61
KLPX	LIC 241C	Tucson	AZ	253.19	136.1	241.0 12.19
XHITAF	OPE 243B	Sonoita	SO	227.19	176.8	215.0 12.19
KZGL	LIC 240C1	Cottonwood	AZ	117.98	42.2	105.0 12.98
ALLO	243	Sonoita	SO	228.41	173.1	215.0 13.41
RADD	ADD 239C3	Parker	AZ	123.25	283.0	96.0 27.25
KBBCFM	LIC 244C2	Lake Havasu City	AZ	132.60	303.3	105.0 27.60
KDVA	LIC 295A	Buckeye	AZ	61.69	144.7	29.0 32.69
KSIQ	LIC 241B	Brawley	CA	256.78	246.3	217.0 39.78
KRFM	LIC 243C	Show Low	AZ	282.97	82.3	241.0 41.97
KWMX	LIC 244C2	Williams	AZ	156.88	29.5	105.0 51.88
KKJT	LIC 242A	Twentynine Palms	CA	298.06	276.3	226.0 72.06
ALLO	242	San Felipe	BN	363.74	208.9	290.0 73.74

Salome Allocation for Channel 270A
D.L. Markley & Associates Inc.

REFERENCE

33 46 54 N
113 36 42 W

CLASS = A

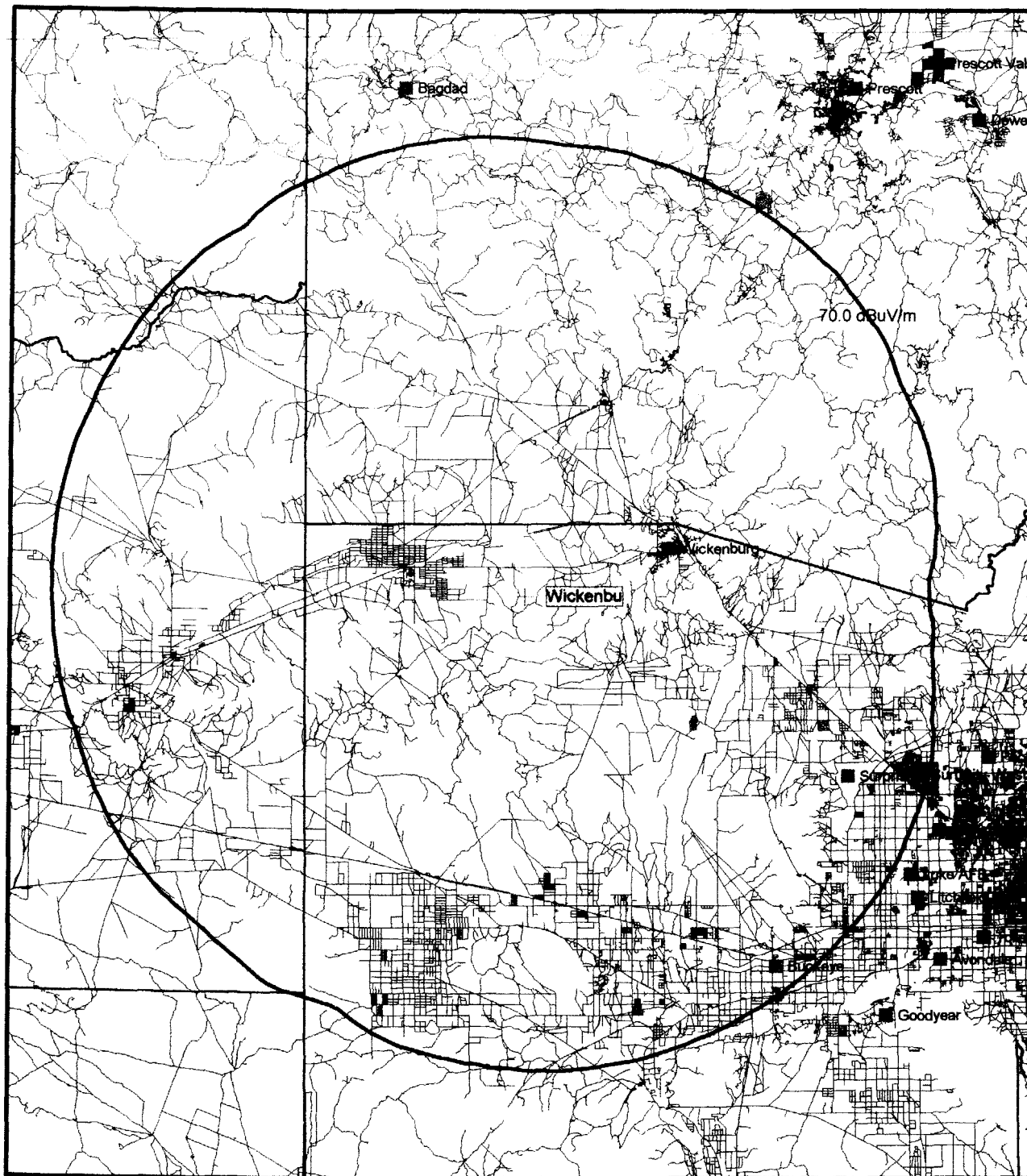
Current Spacings

DISPLAY DATES

DATA 10-05-01
SEARCH 10-09-01

----- Channel 270 - 101.9 MHz -----

Call	Channel	Location		Dist	Azi	FCC	Margin
KAHM	LIC 271C	Prescott	AZ	170.45	53.3	165.0	5.45
ALLO	270	Sonoita	SO	229.83	157.8	210.0	19.83
KJJJ	LIC 272C2	Lake Havasu City	AZ	100.87	328.1	55.0	45.87
ALLO	VAC 272C2	Lake Havasu City	AZ	100.87	328.1	55.0	45.87
ALLO	270	Mexicali	BN	212.90	234.0	163.0	49.90
XHPFFM	OPE 270B	Mexicali	BN	212.90	234.0	163.0	49.90
KFMSFM	LIC 270C	Las Vegas	NV	277.89	333.2	226.0	51.89
KNIXFM	LIC 273C	Phoenix	AZ	152.04	108.8	95.0	57.04
KZON	LIC 268C	Phoenix	AZ	152.27	108.8	95.0	57.27



SIGNAL™: System2.map

Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Groundcover: None
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 1.8 m AGL Gain: 0.00 dBd
 Field strength at remote

■ = 70.0 dBuV/m
 Min. receiver threshold level: -200.0 dBmW

Site	Ant. Elev. AMSL (m)	ERPd (dBW)	Ant. Type/Orient.	Coordinates
Wickenbu	1354.1	50.00	Omni-H	N33°54'15.00"
group: 1	96.3000	MHz		W112°59'02.00"

Notes

This map depicts the predicted 70 dBu service contour from the reference site at reference height (600 m haat) for the proposed Wickenburg 242C rulemaking.



70 dBu FCC Service Contour

KSWG-Wickenburg, Arizona

October, 2001